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April 18, 2011

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Notice, Docket No. ET 10-235

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, *et seq.*, Harris Corporation (“Harris”) hereby notifies the Federal Communications Commission (“Commission”) of the following ex parte communication in the above-referenced proceeding. On April 12, 2011, Jay Adrick, Harris Vice President of Broadcast Technology and Evan Morris, Harris Government Relations Counsel, provided a tour of Harris’ booth at the National Association of Broadcasters 2011 Convention to Commissioner Meredith Atwell Baker and Jennifer Tatel, Legal Advisor to Commissioner Baker. As part of the tour, Harris demonstrated Commercial Loudness Mitigation technology¹ and Mobile Digital Television (“MDTV”) applications.² Harris also showcased its Outdoor Transmission Enclosure, which offers broadcasters a technologically sound and environmentally controlled alternative for broadcasting from non-traditional locations.³

During the tour, Harris representatives referenced statements that were made during a previous ex parte meeting with Commissioner Baker’s Office.⁴ Harris reiterated how broadcast equipment manufacturers are continuously innovating and exploring ways to implement greater efficiencies in broadcast equipment in order to maximize the power of the Advanced Television System Committee’s (“ATSC”) DTV Standards and broadcasters’ use of bandwidth. Conclusions regarding broadcasters’ bandwidth needs must be informed and not only based on their current requirements, but also on their future spectral needs. Broadcasters should not be foreclosed from both maintaining their current level of service and providing new services, such as MDTV, 3DTV, and non real-time services.

¹ Harris Loudness Management Solutions Brochure *available at* http://www.broadcast.harris.com/media/Loudness_25-16281.pdf.

² MDTV applications demonstrated included emergency alerting, real-time traffic, non-real-time travel information, digital signage, twitter, e-learning, and RSScasting.

³ Harris Outdoor Transmission Enclosure Fact Sheet *available at* <http://www.broadcast.harris.com/productsandsolutions/TelevisionTransmission/TelevisionTransmitters/TransmissionEnclosures/OutdoorTransmissionEnclosures.asp>.

⁴ *Ex Parte Notice of Harris Corporation*, In the Matter of Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF, ET Docket No. 10-235 (filed Mar. 29, 2011).



Harris also discussed the ATSC's plan to begin work on a Next Generation Broadcast Standard within the next few months and broadcasters' ability to use MPEG-4 coding in the transmission of the traditional A/53 DTV Standard. In particular, Harris noted that MPEG-4 coding is available under the current A/53 DTV Standard and is currently utilized as part of the A/153 MDTV Standard. Current broadcast equipment is capable of supporting MPEG-4 coding, however, the Commission should note that restrictions on broadcasters' ability to utilize MPEG-4 coding is a result of consumer receivers' inability to process a traditional A/53 over-the-air signal utilizing MPEG-4 coding. The Commission should be cautious of rushing to require MPEG-4 coding as it will only result in moderate, near time spectrum efficiencies and potentially unforeseen disruptions to viewers, broadcasters, and the consumer electronic industry. Harris encourages the Commission to continue to stay apprised of developments involving ATSC's work on a Next Generation Broadcast Standard. The Commission should be supportive of ATSC's work which stands to provide more significant, long term spectrum gains and a more orderly transition to a new advanced broadcast system.

Respectfully submitted,

A handwritten signature in black ink that reads "Jay C. Adrick". The signature is written in a cursive, flowing style.

Jay Adrick
Vice President, Broadcast Technology
Broadcast Communications Division, Harris Corporation

Evan S. Morris, Esq.
Counsel, Government Relations
Harris Corporation

Attachments (1)

CC (via electronic mail):
Jennifer Tatel, Legal Advisor, Office of Commissioner Meredith Atwell Baker